

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Solomon Nkwocha)	Cr. No. <u>2:15-cv-4191-RMG</u>
)	
Plaintiff,)	
)	
vs.)	COMPLAINT FOR RETURN
)	OF SEIZED PROPERTY
Bureau of Alcohol, Tobacco, Firearms and)	
Explosives, An Agency of the)	
United States Department of Justice,)	
)	
Defendant.)	
)	

The Plaintiff complaining of the Defendant above named would allege and show unto this Honorable Court as follows:

1. The Plaintiff is a citizen and resident of Charleston County, South Carolina;
2. On or about November 24, 2014, the Bureau of Alcohol, Tobacco, Firearms and Explosives (hereinafter “ATF”), an agency of the United States Department of Justice, arrested the Plaintiff in Charleston, South Carolina;
3. On or about November 24, 2014, the attached list of items, Exhibit “A”, was seized, and was later the subject of an indictment;
4. Thereafter, numerous items were subsequently seized, although Plaintiff does not know precisely when; these items included vests magnification devices, fastening devices, and ammunition that was back ordered, plus cash and electronic devices;

5. The items subsequently seized were not the subject of an indictment and were not included in the Notice of Seizure and Administrative Forfeiture Proceeding, dated December 18, 2014;
6. The Plaintiff is the lawful owner of the items herein concerned, which are lawful chattels, not contraband;
7. No civil forfeiture action has been filed in any Court;
8. As to the items not the subject of an indictment, Plaintiff prays that they be returned pursuant to 18 U.S.C. § 983(a)(3);
9. As to the items named in an indictment, Plaintiff prays that his interest be protected, and that this matter be heard at such time as may be appropriate;

WHEREFORE, Plaintiff prays that his chattels be returned, immediately as to some, and at such time as the Court deems appropriate, as to the balance.

LAW OFFICE OF
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October ____, 2015

Hardeeville, South Carolina